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October 26, 2020

**VIA ECF**

Hon. Kevin N. Fox, U.S.M.J.  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: Actava TV, Inc., et al. v. Joint Stock Company "Channel One Russia Worldwide" et al. (18-cv-06626)**

Dear Judge Fox:

We represent Plaintiffs in this action. We write because Defendants have objected to Plaintiffs' public filing of ECF No. 204 (letter dated October 23, 2020) on the grounds that Footnote 1 quotes from a document that Defendants designated as "Attorneys' Eyes Only". Although we disagree that any competitively sensitive or otherwise confidential information has been disclosed, we nonetheless request that the letter filed at ECF No. 204 be sealed, with leave granted to re-file this document under seal.

A proposed order is attached.

Respectfully submitted,

*/Toby Butterfield/*

Toby Butterfield

cc: All Counsel (via ECF)

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

## [PROPOSED] ORDER

Docket Entry No. 204 filed in the above-captioned action is hereby sealed.

Plaintiffs are directed to promptly re-file the document under seal and to file a redacted version of the document so that the public may access it. Any counsel that has already downloaded the docket entry is directed to acknowledge to Plaintiffs that they have deleted the document.

## IT IS SO ORDERED.

Dated this \_\_\_\_ day of October 2020.

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**Hon. Kevin Nathaniel Fox, U.S.M.J.**